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10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the*
11 *Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset*
12 *Backed Pass-Through Certificates*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 HSBC BANK USA, NATIONAL
16 ASSOCIATION, AS TRUSTEE, IN TRUST
17 FOR THE REGISTERED HOLDERS OF
18 ACE SECURITIES CORP. HOME EQUITY
19 LOAN TRUST, SERIES 2006-NC2, ASSET
20 BACKED PASS-THROUGH
21 CERTIFICATES,

22 Plaintiff,

23 vs.

24 FIDELITY NATIONAL TITLE GROUP,
25 INC.; CHICAGO TITLE INSURANCE
26 COMPANY; TICOR TITLE OF NEVADA,
27 INC.; DOE INDIVIDUALS I through X; and
28 ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

Case No.: 2:21-cv-01300-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO CHICAGO TITLE
INSURANCE COMPANY'S MOTION
TO DISMISS [ECF No. 19]**

[Third Request]

COMES NOW Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset Backed Pass-Through Certificates ("HSBC Bank") and Defendant Chicago Title Insurance Company ("CTIC"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On July 8, 2021, HSBC Bank filed its Complaint in Eighth Judicial District Court, Case No. A-21- 837574-C [ECF No. 1-1];

2. On July 8, 2021, CTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On September 10, 2021, CTIC filed its Motions to Dismiss [ECF No. 19];
4. HSBC Bank's deadline to respond to CTIC's Motion to Dismiss is currently November 5, 2021 [ECF No. 27];
5. On November 5, 2021, the Ninth Circuit issued its Order vacating and remanding the district court's decision granting the title insurer's motion to dismiss in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Case No. 3:19-cv-00241-MMD-WGC, 2019 WL 5578487 (D. Nev. October 29, 2019) ("*Wells Fargo I*"). Because CTIC's Motion to Dismiss relies, in-part, on the district court's ruling in *Wells Fargo II*, HSBC Bank requests a two-week extension until November 19, 2021 to brief the pending issues given the Ninth Circuit's recent order;
6. Counsel for Defendants does not oppose the requested extension;
7. This is the third request for an extension which is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 5th day of November, 2021.

WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Dragon

Lindsay D. Dragon, Esq.

Nevada Bar No. 13474

7785 W. Sahara Ave., Suite 200

Las Vegas, NV 89117

Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee in Trust for the Registered Holders of ACE Securities Corp. Home Equity Loan Trust, Series 2006-NC2, Asset Backed Pass-Through Certificates

DATED this 5th day of November, 2021.

SINCLAIR BRAUN LLP

/s/ Kevin S. Sinclair

Kevin S. Sinclair, Esq.,

Nevada Bar No. 12277

16501 Ventura Boulevard, Suite 400

Encino, California 91436

Attorneys for Defendants Fidelity National Title Group, Inc.; Chicago Title Insurance Company; and Ticor Title of Nevada, Inc.

IT IS SO ORDERED.

Dated this 8th day of November, 2021.


UNITED STATES DISTRICT COURT JUDGE